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by Mag/Judge L Patrick Aulch

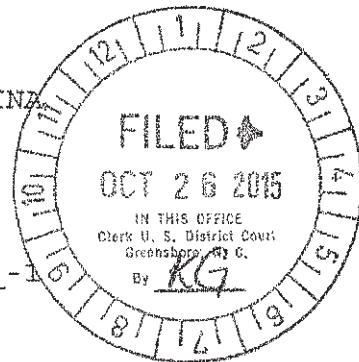


IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :  
: v.  
: TIFFANIE ANITA BRACK :

1:15CR303 -1



The Grand Jury charges:

COUNT ONE

1. At all times material herein, Capital One Bank, N.A., was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. At all times material herein, Capital One Bank, N.A., and its subsidiaries, offered customers consumer credit card accounts. At all times material herein, customers could apply for a Capital One credit card by telephone or by internet application.

3. At all times material herein, TIFFANIE ANITA BRACK was a resident of Greensboro, Guilford County, in the Middle District of North Carolina. At all times material herein, TIFFANIE ANITA BRACK resided at 3629 Sweet Birch Drive, Greensboro, North Carolina.

4. From on or about January 1, 2015, continuing up to and including on or about October 1, 2015, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle

District of North Carolina, TIFFANIE ANITA BRACK did devise and intend to devise a scheme and artifice to defraud Capital One Bank, N.A., of money in the approximate amount of \$40,000.00 by falsely and fraudulently applying for Capital One credit cards by telephone using false names and Social Security numbers and directing Capital One Bank, N.A., to send the fraudulently obtained credit cards to TIFFANIE ANITA BRACK at her home address or to the addresses of neighbors and associates of TIFFANIE ANITA BRACK in Greensboro and High Point, North Carolina.

5. It was a further part of the scheme and artifice to defraud that TIFFANIE ANITA BRACK created false names and Social Security numbers to use in applying for Capital One credit cards.

6. It was a further part of the scheme and artifice to defraud that TIFFANIE ANITA BRACK applied for Capital One credit cards by phone, using the false names and false Social Security numbers.

7. It was a further part of the scheme and artifice to defraud that TIFFANIE ANITA BRACK directed Capital One to mail the falsely obtained credit cards to her home address of 3629 Sweet Birch Drive, Greensboro, North Carolina, or to a neighbor's or an associate's address.

8. It was a further part of the scheme and artifice to defraud that TIFFANIE ANITA BRACK would recover the fraudulently obtained credit cards from the mail boxes of neighbors and associates to which she had caused Capital One Bank, N.A. to mail fraudulently obtained credit cards.

9. It was a further part of the scheme and artifice to defraud that TIFFANIE ANITA BRACK made use of the fraudulently obtained Capital One credit cards to make automatic teller machine (ATM) withdrawals of cash for her personal use.

10. It was a further part of the scheme and artifice to defraud that TIFFANIE ANITA BRACK used fraudulently obtained Capital One credit cards to purchase goods and services for her own use and benefit, including veterinarian services for her dogs and auto repairs.

11. It was a further part of the scheme and artifice to defraud that TIFFANIE ANITA BRACK used a fraudulently obtained Capital One credit card in the name of "Carol Vanstory" to pay a \$300.00 vehicle tax bill on a 2009 Mercedes Benz automobile titled in the name of TIFFANIE ANITA BRACK's mother but operated by TIFFANIE ANITA BRACK.

#### EXECUTION

12. On or about March 8, 2015, in the County of Guilford, in the Middle District of North Carolina, TIFFANIE ANITA BRACK, for the purpose of executing the aforesaid scheme and artifice

to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Linda Carter, 3629 Sweet Birch Lane, Greensboro, North Carolina, containing a Capital One credit card, account number ending in 8308, falsely obtained by TIFFANIE ANITA BRACK using the name of "Linda Carter"; in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT TWO

1. The Grand Jury realleges and incorporates paragraphs 1 through 11 of Count One, as if fully set forth herein.
2. On or about March 8, 2015, in the County of Guilford, in the Middle District of North Carolina, TIFFANIE ANITA BRACK, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Anita Johnson, 3629 Sweet Birch Lane, Greensboro, North Carolina, containing a Capital One credit card, account number ending in 8308, falsely obtained by TIFFANIE ANITA BRACK using the name of "Anita Johnson"; in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT THREE

1. The Grand Jury realleges and incorporates Paragraphs 1 through 11 of Count One, as if fully set forth herein.

2. On or about May 21, 2015, in the County of Guilford, in the Middle District of North Carolina, TIFFANIE ANITA BRACK, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Carol Vanstory, 2410 Tyson Street, Apt. C, High Point, North Carolina, containing a Capital One credit card, account number ending in 8308, falsely obtained by TIFFANIE ANITA BRACK using the name of "Carol Vanstory"; in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT FOUR

1. The Grand Jury realleges and incorporates Paragraphs 1 through 11 of Count One, as if fully set forth herein.

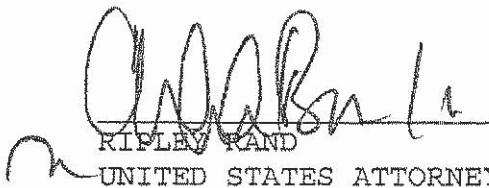
2. On or about June 27, 2015, in the County of Guilford, in the Middle District of North Carolina, TIFFANIE ANITA BRACK, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, knowingly caused to be delivered by United States Mail and by commercial interstate carrier according to the directions thereon, a package addressed to Labrishia Leach, 2410 Tyson Street, Apt. C , High Point, North

Carolina, containing a Capital One credit card, account number ending in 6321, falsely obtained by TIFFANIE ANITA BRACK using the name of "Labrishia Leach"; in violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL:



FRANK J. CHUT, JR.  
ASSISTANT UNITED STATES ATTORNEY


RIPLEY RAND  
UNITED STATES ATTORNEY